



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

MEMORANDUM ENDORSED

November 22, 2021

VIA ECF

Honorable Gregory H. Woods
United States District Judge
United States District Court
500 Pearl Street, Room 2260
New York, NY 10007

USDC SDNY
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Re: *Charpentier, et al. v. Department of Homeland Security, et al.*, 20 Civ. 7510 (GHW)

Dear Judge Woods:

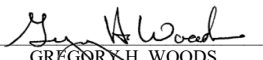
The parties hereby submit this Joint Status Report pursuant to their representation to the Court that they would file their next status report on November 22, 2021, and pursuant to this Court's Order. *See* ECF Nos. 54, 55. The parties have continued to confer regarding the FOIA requests made to United States Immigration and Customs Enforcement ("ICE"), United States Department of State ("State") and United States Citizenship and Immigration Services ("USCIS"), however, the parties need additional time to continue their discussions. As explained in the September 17, 2021 letter, the government had requested additional information from plaintiffs' counsel regarding the ICE and State requests, *see* ECF No. 54, and plaintiffs' counsel still needs to provide that information. Plaintiffs have stated that they will endeavor to provide that information to the government within 30 days, and then the parties will confer again. Plaintiffs' counsel has also reviewed the draft *Vaughn* index provided by United States Citizenship and Immigration Services ("USCIS"), and the parties are conferring in the hopes that they can resolve issues relating to the USCIS production without further intervention of the Court. The parties therefore respectfully request that they file a joint status letter on January 21, 2022.

On behalf of both parties, I thank the Court for its consideration of this submission.

Application granted. The parties are directed to file their next joint status letter on or before January 21, 2022.

SO ORDERED.

Dated: November 21, 2021
New York, New York


GREGORY H. WOODS
United States District Judge

Respectfully submitted,

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